



Wireless Internet Service Providers Association

July 11, 2013

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**Re: Notice of Oral Ex Parte Presentation  
GN Docket No. 12-354**

Dear Ms. Dortch:

On July 10, 2013, on behalf of the Wireless Internet Service Providers Association (“WISPA”), I met with members of the Wireless Telecommunications Bureau and the Office of Engineering and Technology to discuss the above-referenced pending rulemaking proceeding.<sup>1</sup> Joining me was Stephen Coran, WISPA’s counsel. The attached presentation was distributed and discussed at the meeting.

In addition to the points made in the written presentation, we stressed that wireless Internet service providers (“WISPs”) desire more spectrum for fixed wireless broadband services in rural areas, and that the 3550-3650 MHz band afforded the Commission an opportunity to put spectrum to use quickly. To that end, we suggested that the Commission may want to adopt separate rules for urban areas, coastal areas (where shipborne radar systems are more prevalent) and rural areas, where higher-power operations could be authorized. We emphasized that WISPA’s spectrum sharing proposal, discussed more fully in its Comments, was intended to protect incumbent federal and non-federal users and allow deployment of small cells and higher-power broadband services. We also explained that existing 3650-3700 MHz licensees should obtain protection against subsequent unlicensed users in the band. We expressed support for any regulatory scheme that afforded WISPs the opportunity to access additional spectrum under rules that promoted stability and an expectation, through a geolocation database, of continued and ongoing spectrum use.

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<sup>1</sup> A list of the Commission attendees is attached hereto, and courtesy copies are being provided by email to each.

Pursuant to Section 1.1206 of the Commission's Rules, this letter is being filed electronically via the Electronic Comment Filing System in the above-captioned proceedings.

Respectfully submitted,

*/s/ Matt Larsen*

FCC Committee Chair

Enclosures

### **List of FCC Attendees**

John Leibovitz

Brian Regan

Paul Powell

Robert Nelson

Tom Struble

Navid Golshani

Kamran Etemad

Bob Pavlak

Garth Hahn

Mark Settle

Pramesh Jobanputra

Liz Munde-Barket



# **3550-3650 MHz Citizens Broadband Service: The Rural WISP Opportunity**

July 10, 2013



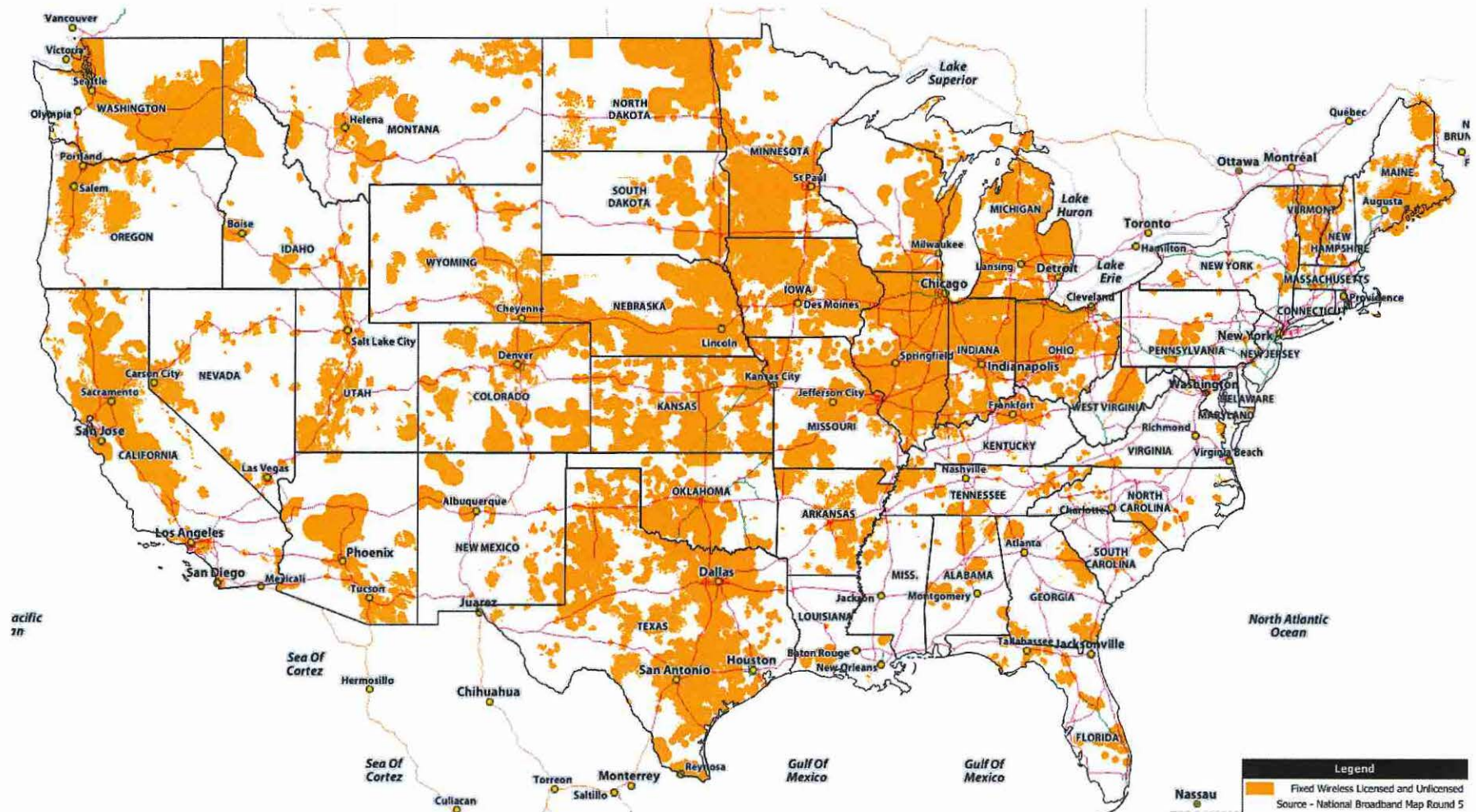
# Who is WISPA

The trade association for wireless Internet service providers

- 700 members
- Provide unsubsidized cost-efficient service to areas that cannot be economically reached by wireline platforms
- Rely on Part 15 unlicensed spectrum in the 900 MHz, 2.4 GHz and 5 GHz bands, “lightly licensed” spectrum in the 3650-3700 MHz band and licensed spectrum primarily for backhaul
- Active participant in FCC proceedings involving spectrum, including the 3550-3650 MHz band



# Where WISPs Are



# Overview

- NPRM specifically acknowledged “significant value” in the band for fixed wireless broadband
- WISPA supports access to additional spectrum for fixed wireless broadband, especially in rural areas
- Spectrum sharing enables efficient spectrum use
  - Three-tiered Spectrum Access System (SAS) managed by geolocation database
    - Accommodates incumbents, rural broadband and small cells
    - Enables coordination among unlicensed users
    - Lowers barriers to entry
  - Spectral separation
    - Provides order within SAS to establish greater certainty (~50 MHz segments)
  - Geographic protection zones
    - Protect federal users and incumbent earth stations



# 3550-3600 MHz Segment

- Incumbent Access
  - Federal users
    - Commercial and federal databases to interface
- Priority Access
  - Small cells, subject to federal incumbent use
- General Authorized Access
  - Opportunistic uses, subject to federal incumbent and small cell use



# 3600-3650 MHz Segment

- Incumbent Access
  - Federal users
  - Grandfathered earth stations
    - Commercial and federal databases to interface
- Priority Access
  - High Power Operation Zones in rural areas, subject to Incumbent Access use
    - Creates 100 MHz (3600-3700 MHz) of contiguous spectrum for WISP operations
    - Broad definition of “rural areas” to promote efficient spectrum use in areas where small cells are not likely to be deployed
- General Authorized Access
  - Opportunistic uses, subject to federal incumbent and Priority Access use

# 3650-3700 MHz Segment

- Incumbent Access
  - Federal users
  - Grandfathered earth stations
- Priority Access
  - Grandfathered 3650-3700 MHz licensees
  - High Power Operation Zones in rural areas, subject to federal incumbent use and earth station protection zones
    - Band has not been utilized extensively for small cells, but by WISPs, utilities and municipalities
- General Authorized Access
  - Opportunistic uses, subject to Incumbent Access and Priority Access uses

# Additional Proposals

- Harmonize 3550-3650 MHz and 3650-3700 MHz rules
  - Extend 3650-3700 MHz operating rules to rural areas in 3550-3650 MHz band
  - Migrate existing ULS database registration to SAS over five years
  - Consider higher power limits
- Eliminate “restricted” and “unrestricted” protocol designations in 3650-3700 MHz band
- Eliminate end user registration requirements



# Conclusion

- The 3550-3650 MHz band is of significant importance to WISPs because it is adjacent to the existing 3650-3700 MHz band and can be integrated quickly with existing equipment
- SAS is a more reliable spectrum management tool for incumbents and helps coordinate shared and unlicensed use
- WISPA proposal does not exclude uses, but organizes disparate uses into preferred spectrum segments
- WISPA proposal will drive innovation in two equipment segments – small cells and high power fixed rural broadband
- 3.5 GHz Band does not present as many sharing challenges as 5 GHz band, so FCC can move quickly to adopt rules